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SEP 17 2007

Application No. 10/073,269

Reply to Office Action

INTERVIEW SUMMARY

Applicants thank the Examiner for the interview held with applicants' undersigned representative on September 14, 2007. The distinctions over the Oldfield reference were discussed. No final agreement was reached, but the Examiner requested that the arguments be submitted for fuller consideration.

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REMARKS/ARGUMENTS

Applicants thank the Examiner for the careful review and analysis of the claims as embodied in the Office Action mailed June 14, 2007. Applicants understand the art and the issues raised by the Examiner, and request favorable reconsideration in view of the attached amendments and the following explanations and clarifications.

Claim 16 stands rejected under 35 U.S.C. §101 as directed to non-statutory subject matter. The Examiner has suggested an appropriate amendment, which has been made herein. Favorable reconsideration of the rejection in view of this amendment is requested.

Claims 1 and 3-16 are currently pending and stand rejected at this time as allegedly obvious in view of Oldfield et al. (EP 0622729, hereinafter "Oldfield") further in view of Love (EP 0262759, hereinafter "Love"). However, it is again respectfully submitted that Oldfield fails to teach each of the limitations of the claims for which Oldfield was cited. In particular, claim 1 requires, among other things, that the user interface designing apparatus must have "event handling **editing** means for describing event handling for a state transition in each of the states of the composite display part."

However, the interface design apparatus of Oldfield does not contain any means for editing the handling of events. Instead, event handling is left to the applications that eventually use the generated interface. The citations previously provided will not be again discussed, but are included in a footnote below for the Examiner's convenience.¹ In addition to the prior citations, the remainder of Oldfield confirms the prior statement, i.e., that the **Oldfield system relies upon the application, not the user interface, for event handling.**

With respect to the element of an "event handling editing means for editing event handling," the Action cites the User Interface server of Oldfield. *See Action* at page 7 ("Oldfield

¹ Oldfield, page 18, lines 43-47 ("Each *application* controls the display and appearance of their user interfaces by issuing commands... the sequence by which the UIS commands are issued *by the application...determine which application functions will respond to user generated events.*;" see also Figure 2a (showing distinction between Applications (50, 53, 54) and Interface Editor (49)); see also page 21, lines 22-25: "Thus far the user has been in the interface design mode... [However, i]n test mode the *default mechanisms associated with mouse actions apply.*"

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teaches an event handler in the form of an interface server, which handles events or queries...thus teaching the event handler.”) However, claim 1 does not recite an event handler, but rather an event handling editing means for editing event handling; and the interface server of Oldfield is a server, not an editor.

Accordingly, it is respectfully submitted that Oldfield fails to teach at least this element of claim 1, namely that the user interface designing apparatus has "event handling editing means for describing event handling for a state transition in each of the states of the composite display part." Thus, favorable reconsideration of claim 1, and dependent claims 3-12, and withdrawal of the outstanding rejections is respectfully requested.

Moreover, as previously noted, independent claims 1 and 13, and thus their dependent claims as well, contain limitations drafted in means-plus-function format pursuant to 35 U.S.C. §112¶6. According to MPEP 2181, this claim must be treated according to §112¶6, or a detailed reason must be given as to why such limitations were not treated as means-plus-function limitations. Applicants note that the Action states at page 7 that the claims have been treated in accordance with MPEP §2181. However, clarification is requested as to whether the claims were treated under §112¶6 or were deemed to be excluded therefrom. It assumed to be the intent of the Office to treat the claims under §112¶6, but there does not appear to be any §112¶6 analysis in the Action. The statutory requirements of 35 U.S.C. §112¶6 are as follows:

An element in a claim for a combination may be expressed as a means or step for performing a specified function without the recital of structure, material, or acts in support thereof, and such claim shall be construed to cover the corresponding structure, material, or acts described in the specification and equivalents thereof.

(Emphasis added). If the rejections of the claims are maintained, it is respectfully requested that the claims be treated under §112¶6, where appropriate, according to the Action's presently stated intent.

As noted above, all claims stand rejected in view of a combination of Oldfield and Love. The Action's stated reason for combining these references is that doing so would allegedly enable "easy modification of the interfaces and displays." However, the Action also admits that

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the system of Love is *more* complex, having multiple states and models, and it appears that the use of Love within Oldfield would actually increase complexity, not simplify the system. Clarification is requested. Moreover, it is not clear how, or even *if*, the multiple state editing modeling architecture of Love would work in juxtaposition with the specialized user interface server which is the heart of the Oldfield system. If it is the Office's contention that the Love system would be transparent to the Oldfield user interface server, this seems highly unlikely, and clarification as to how such a system would work is respectfully requested. It is not seen by Applicants how the combination of Oldfield and Love would yield a functional system.

Additional Notes

Love teaches to design management of a state of user interaction. However, Love fails to describe how a display is designed in each state concretely. Further, Love fails to describe how display parts are redesigned.

Oldfield teaches what display parts are used so as to compose a scene. However, Oldfield fails to teach that a user can design and add a new display part. Further, Oldfield fails to teach that such new display parts have a plurality of states and that similar display parts can also be laid out for each of these states.

Further Oldfield and Love fails to reach the features of claim 1, namely that each composite display part has different groups of display parts defined for each of their respective states, as described from the second paragraph of page 13 to the second paragraph of page 14 of the specification. Also, Oldfield and Love fail to teach that such composite display parts can also be laid out in any state of other composite display parts. In other words, neither Oldfield nor Love describe combining a state space and a display part hierarchy to make a new display part.

The above-mentioned subject matter is realized by the state display editing means of claim 1. The state display editing means adds or deletes a composite display part from each state of another composite display part to make a new composite display part in which a plurality of composite display parts are hierarchically combined. Therefore, in the present invention, since a plurality of composite display parts are hierarchically combined as mentioned above, the effect of avoiding a combinatorial explosion which may otherwise occur upon handling within one

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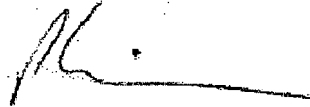
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state space can be obtained, as described in the second paragraph of page 15 of the specification. Neither Oldfield nor Love describe a state display editing means for combining a state space and a display part hierarchy to make a new part, and constructing a hierarchical construction by using such new parts.

Conclusion

In summary, it is respectfully submitted that (a) Oldfield does not teach the limitations for which it is cited, (b) the claims which are written in means-plus-function format do not appear to have been treated fully under 35 U.S.C. §112, ¶6, and (c) there is no analysis as to how the modification of Oldfield in view of Love could yield a functional system. Thus it is respectfully suggested that the independent claims and their dependent claims are patentable over the cited combination of Oldfield and Love.

Respectfully submitted,



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